



JOHN ENGLER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
CADILLAC DISTRICT OFFICE

US EPA RECORDS CENTER REGION 5



527001



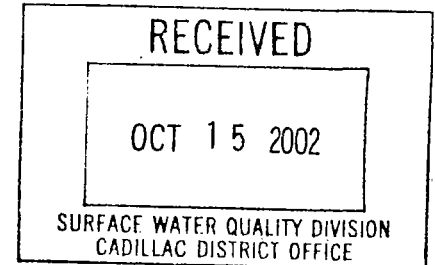
RUSSELL J. HARDING
DIRECTOR

October 14, 2002

Mr. Chris Hubbel
Williamsburg Receiving and Storage
10190 Munro Road
Williamsburg, MI 48690

Dear Mr. Hubbel:

SUBJECT: Williamsburg Receiving and Storage
Consent Order 31-07-02



Thank you for meeting with Department of Environmental Quality (DEQ) staff to inspect Williamsburg Receiving and Storage (Facility). The purpose of the inspection was to review compliance with the conditions of Consent Order 31-07-02 (Order) and to discuss compliance issues.

The Facility continues to pump and haul wastewater as it is being generated in accordance with the Order. Wastewater remaining in the lagoon is aerated. The aeration and lime addition conducted in accordance with the Odor Control Work Plan appears to be successful, as water appears to be aerobic in character and color, and there were no obvious odors. The lagoon water elevation has held at five feet at the depth gauge.

We discussed other possible sources of odors from other site activities which might have been mistaken for lagoon odors by complainants. You indicated that empty brine pits may fill with precipitation that goes anaerobic. Also, the brine itself may have a strong smell when the pits are being filled. The facility is excavating soils where the Gray and Company brine pits have been removed. The initial pit removal may have been a source of odors. You indicated that the soils underneath the pits were dark colored, but as they were left open to the air, the color became browner. The soils are being excavated, and no additional sources of odors were detected during the site visit.

We also discussed the submittals regarding the brine pit liners. The submittals show the pits to be lined with two 40 ml Polyvinyl chloride (PVC) liners. This differs from what was discussed previously, and you indicated you would ensure that the diagram is accurate. However, even double 40 ml PVC liners do not meet secondary containment requirements. We discussed the possibility that brine could be stored in above ground tanks and moved indoors. Such tanks would meet the containment requirement and eliminate other possible concerns regarding odors, transfer of brine, and storm water collection in the empty lagoons. The Secondary Containment Work Plan is not due until 180 days from the date of the Order; therefore, the discussion is theoretical at this point.

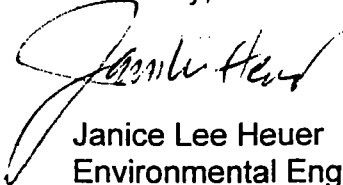
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No water was collected in the storm water basin east of the brine pits. In addition, the brine mixing tanks located east of former Gray and Company pits have been removed. DEQ staff also observed that solid waste is stored in a closed container located inside of the building used for storage and removal of process water. Floor drains in that building apparently flow to the concrete pit used for process water which serves as secondary containment.

Staff observed the ditch along Munro Road had been cleaned out by the County Road Commission. We were then informed there was a pipe located in the ditch that caused standing water to be present throughout this summer. Since the pipe has been removed, it will no longer be necessary to sample the water as requested in the DEQ's August 22, 2002 letter to the Facility.

If you have any questions, please give me a call.

Sincerely,



Janice Lee Heuer
Environmental Engineer
Water Division
231-775-3960, Extension 6203

cc: Ms. Sandra Beckwith, Whitewater Township Supervisor
Mr. Joseph Quandt, Zimmerman, Kuhn, Darling, Boyd, Taylor and Quandt, PLC
Mr. Rick Rusz, DEQ
Ms. Janna Sebald, DEQ
Ms. Sy Paulik, DEQ
Mr. Shane Nixon, DEQ